

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

Regional International Corp. and Mead's  
Automotive, LLC, on behalf of themselves  
and all others similarly situated,

Plaintiffs,

v.

Espar Inc. and Espar Products Inc.,

Defendants.

Case No. 1:15-cv-01798-JG-JO

**PLAINTIFFS REGIONAL INTERNATIONAL CORP. AND MEAD'S AUTOMOTIVE,  
LLC'S MOTION RE: APPOINTMENT OF INTERIM CO-LEAD CLASS COUNSEL  
FOR INDIRECT-PURCHASER PLAINTIFFS**

Pursuant to Rule 23(g) of the Federal Rules of Civil Procedure, Plaintiffs Regional International Corp. and Mead's Automotive, LLC respectively move this Court for an order appointing the Law Offices of Francis O. Scarpulla ("Scarpulla Firm") and the firm of Cooper & Kirkham, P.C. ("Cooper & Kirkham") as Interim Co-Lead Class Counsel for the Indirect-Purchaser Plaintiffs in the cases involving anticompetitive activities in the after-market truck heater industry (*Raccoon Valley Transport Inc., et al. v. Espar, Inc., et al.*, No. 1:15-cv-01338-JG-JO (E.D.N.Y.); *Regional International Corp., et al. v. Espar Inc., et al.*, No. 1:15-cv-01798-JG-JO (E.D.N.Y.)), and any subsequently filed Indirect-Purchaser cases.

As described in the accompanying memorandum of law in support hereof, the Scarpulla Firm and Cooper & Kirkham individually and collectively have had extensive experience and success in handling antitrust class actions, can commit the resources necessary to represent the classes through trial, if necessary, and have diligently worked to identify and investigate the potential claims at issue in this litigation.

Accordingly, for the reasons provided above, in the accompanying memorandum of law, the Declaration of Francis O. Scarpulla in Support of Plaintiffs Regional International Corp. and Mead's Automotive, LLC's Motion Re: Appointment of Interim Co-Lead Class Counsel for Indirect-Purchaser Plaintiffs, the Declaration of Josef D. Cooper in Support of Plaintiffs Regional International Corp. and Mead's Automotive, LLC's Motion Re: Appointment of Interim Co-Lead Class Counsel for Indirect-Purchaser Plaintiffs, and for good cause shown, Plaintiffs Regional International Corp. and Mead's Automotive, LLC, respectfully request that the Court appoint the Scarpulla Firm and Cooper & Kirkham as Interim Co-Lead Counsel for the Indirect-Purchaser Plaintiffs.

Dated: May 15, 2015

Respectfully submitted,

By: /s/ Francis O. Scarpulla  
Francis O. Scarpulla (*pro hac vice*)

LAW OFFICES OF FRANCIS O. SCARPULLA  
44 Montgomery Street, Suite 3400  
San Francisco, CA 94104  
Telephone: (415) 788-7210  
Facsimile: (415) 788-0706  
Email: [fos@scarpullalaw.com](mailto:fos@scarpullalaw.com)

By: /s/ Josef D. Cooper  
Josef D. Cooper (*pro hac vice*)

Tracy R. Kirkham (*pro hac vice*)  
John D. Bogdanov (*pro hac vice*)  
COOPER & KIRKHAM, P.C.  
357 Tehama Street, 2<sup>nd</sup> Floor  
San Francisco, CA 94103  
Telephone: (415) 788-3030  
Facsimile: (415) 882-7040  
E-mail: [jdc@coopkirk.com](mailto:jdc@coopkirk.com)  
[trk@coopkirk.com](mailto:trk@coopkirk.com)  
[jdb@coopkirk.com](mailto:jdb@coopkirk.com)

Lawrence H. Schoenbach  
LAW OFFICES OF  
LAWRENCE H. SCHOENBACH, PLLC  
The Trinity Building  
111 Broadway, Suite 701  
New York, New York 10006  
Telephone: (212) 346-2400  
Facsimile: (212) 937-3100  
Email: [schoenbachlawoffice@att.net](mailto:schoenbachlawoffice@att.net)

Philip A. Cala  
Attorney at Law  
Furniture Mart Office Bldg  
Suite 1000  
Jamestown, NY 14701  
Telephone: (716)483-2252  
Email: [artlaw@windstream.net](mailto:artlaw@windstream.net)

*Counsel for Plaintiffs Regional International Corp.  
and Mead's Automotive, LLC*